

Art Unit: 2895

REMARKS

Applicants request reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 44-55 and 57 are now pending in the present application. Claims 44 and 57 are the independent claims.

Claim 44, 49, and 57 have been amended. Applicants submit that the amendments to claim 49 relate merely to matters of form and do not affect the scope of this claim. Applicants also submit that support for the amendments to claims 44 and 57 can be found at least at, for example, FIGS. 1 and 2 of the present application as originally filed. Thus, no new matter has been added.

Claims 44-55 and 57 stand rejected under the second paragraph 35 U.S.C. 112 as indefinite.

Initially, Applicants thank the Examiner for further explaining the basis for this rejection. For reasons unrelated to this rejection, and without conceding the propriety of this rejection, Applicants have amended claims 44 and 57 in manners that have removed the allegedly offending recitations. Thus, this rejection is submitted to be moot.

Accordingly, favorable reconsideration and withdrawal of the rejection under 35 U.S.C. § 112 are respectfully requested.

Art Unit: 2895

Applicants note the absence of an art rejection of the claims. Nonetheless, in the spirit of compact prosecution, the patentability of the claims over previously cited is explained.

Most recently, independent claims 44 to 57 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,556,409 (*Chittipeddi et al.*) in view of conventional input circuit illustrated in FIG. 14 of Applicants' disclosure (the conventional input circuit) and U.S. Patent No. 6,154,388 (*Oh*).

Applicants respectfully submit that amended claims 44 and 57 patentably define over the cited art, even in combination.

For example, independent claim 44 now recites, *inter alia*, a fuse disposed between a wiring and at least one of [a plurality of] electrostatic protection elements so that the fuse is between the at least one electrostatic protection element and an inner circuit, the fuse being selectively disconnectable so as to selectively disconnect the at least one electrostatic protection element from the wiring when more than one semiconductor chip is mounted in a package with the semiconductor chip and commonly connected to the input pad.

Firstly, none of the formerly cited art even suggests selective connectability/disconnectability based on the number of chips in a package. *Chittipeddi et al.* is silent as to this feature, seeking instead to avoid impacting buffer performance during operation. Further, the conventional input circuit is also silent as to such features, not even mentioning a fuse. And, *Oh*, cited for allegedly showing the state of the art, does not

Art Unit: 2895

teach or suggest anything that remedies the deficiency in the combination of *Chittipeddi et al.* and the conventional input circuit. Indeed, the fuse of *Oh* is blown after data has been written to the memory IC 12 so as to isolate the memory IC 12. (*Oh*, Col. 3, lines 9-12).

Secondly, none of the formerly cited art even suggests the claimed locations of the fuse(s). And, this silence is not surprising in view of the uses of the fuses in the cited art and the objects of those cited art documents. For example, *Oh* teaches a fuse located between a pad 100 and the alleged ESP, not the ESP and the inner circuit. (*Oh*, FIG. 2).

In view of the foregoing, Applicants respectfully submit that the independent claims patentably define the present invention over the citations of record. Further, the dependent claims should also be allowable for the same reasons as their respective base claims and further due to the additional features that they recite. Separate and individual consideration of the dependent claims is respectfully requested.

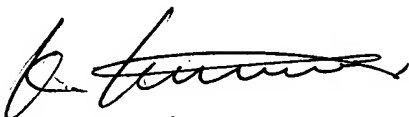
Applicants believe that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action. However, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to such matters.

There being no further outstanding objections or rejections, it is submitted that the present application is in condition for allowance. An early action to that effect is courteously

Art Unit: 2895

solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kazunao Kubotera', written in a cursive style.

Kazunao Kubotera

Reg. No. 51,194

KUBOTERA & ASSOCIATES, LLC

200 Daingerfield Rd.

Suite 202

Alexandria, VA 22314

Tel. (703) 684-9777